## REMARKS

Claims 1-22 are pending in this application. By this Amendment, claims 1, 6, 11, 16 and 22 are amended. No new matter is added.

### I. Personal Interview

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Smith in the July 11, 2005 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

### II. Claim Rejections Under 35 U.S.C. §102

Claim 22 is rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,421,733 to Tso et al. ("Tso"). The rejection is respectfully traversed.

Tso fails to disclose each and every feature recited in the rejected claim, as amended. For example, Tso fails to disclose a method for managing the look and feel of a web site, comprising receiving a first object representing an information request from a user, determining an identity of a client associated with the information request, determining content elements and presentation elements associated with the client from an identity storage repository, retrieving the requested information from an information provider, creating a skeleton virtual content record based on the content elements and the presentation elements of the client, merging the retrieved requested information and the skeleton/virtual content record to create a second object representing a document consistent with the content elements and presentation elements associated with the client, and outputting the document to the user, as recited in amended claim 22.

The Office Action alleges that Tso discloses determining content elements and presentation elements associated with the client at col. 6, line 64-col. 8, line 9. However, beginning at col. 6, line 64, Tso merely discloses that the parser 22 which is part of a remote transcoding server 34 may selectively invoke one of a number of transcode service providers

(or software programs) 24, based upon satisfaction of a predetermined selection criterion. Tso then goes on to give a number of examples of such selection criterion. Tso specifically discloses that such selection criterion may comprise, for example, information contained in a header portion of a data packet received by the transcoding server 34 such as a MIME type, a URL or uniform resource locator, a last modified time indicator, and so on. Other disclosed examples of types of information which may be used to dictate which of the particular transcode service providers 24 are invoked include network client display criteria such as displayed dimension, resolution, number of colors, etc. However, Tso fails to disclose that these selection criteria which are used to invoke a particular transcode service provider used to manipulate data (see col. 2, lines 47-49 of Tso) are determining content elements and presentation elements associated with a client from an identity storage repository. Rather, Tso merely discloses that such selection criteria may be contained in a data packet that is received by the transcoding server 34 to select software to manipulate data.

The Office Action also alleges that Tso discloses creating a virtual content record based on the content elements and the presentation elements of the client and again relies on col. 6, line 64-col. 8, line 9 of Tso to support the allegation. The Action goes on to allege that retrieved requested information is merged with the virtual content record to create a document consistent with the content elements and presentation elements associated with the client and once again relies on col. 6, line 64-col. 8, line 9. Although Tso discloses a number of ways in which the desired transcode service provider is selected to manipulate data, there is no disclosure of creating a virtual skeleton content record or merging retrieved information into such a skeleton/virtual content record. Applicants submit that a general definition of transcoding or manipulating data does not satisfy the requirement of 35 U.S.C. §102 as anticipating the features recited in the rejected claims.

Furthermore, as clearly shown in at least Figs. 3 and 5 of Tso, the same data is merely being passed back and forth between the server and the client. In contrast, amended claim 22 recites that a second object is created that represents the retrieved information, i.e., from the service provider and the selected skeleton/virtual content record, thereby providing a new document that is consistent with what the client (user) is observing. Accordingly, withdrawal of the rejection of claim 22 under 35 U.S.C. §102(e) is respectfully requested.

## III. Claim Rejections Under 35 U.S.C. §103

Claims 1-21 are rejected under 35 U.S.C. §103(a) as unpatentable over Tso in view of U.S. Patent No. 6,463,440 to Hind et al. ("Hind"). The rejection is respectfully traversed.

Neither Tso nor Hind, whether considered alone or in combination, disclose or suggest each and every feature recited in the rejected claims. For example, the combination of references fails to disclose or suggest a system for managing identity information in a merged content portion, comprising an identity storage that stores identity information including content elements and style sheet information, associated with a plurality of referring clients and user; a client and user determining circuit that determines a first object representing a sending client and a user of a received request for information from an information provider; a skeleton/virtual content determining circuit that determines which of the stored identity information and the style sheet information correspond to the client and the user to create a skeleton/virtual content record based on determined stored identity information and style sheet information; an input/output circuit that requests and receives the information from the information provider; and a merging circuit that determines the merged content portion based on received information received from the information provider and the created skeleton/virtual content record and merges the merged content portion into the created skeleton/virtual content record to create a second object different from the first object, the

created second object is outputted to the sending client and the user to maintain a look and feel of a client website, as recited in amended claim 1.

It is alleged in the Office Action that Tso teaches an identity storage that stores identity information including content element and transformation information associated with a client and a user at col. 6, line 64-col. 8, line 9. Applicants submit that Tso fails to disclose any such feature. As discussed above, the referenced section of Tso merely discloses selection criterion that is used by the transcoding server 34 to choose a transcode service provider 24 for further manipulation of data. Additionally, as previously stated, the only recitation of where such predetermined selection criteria may come from is within a data packet being received by the transcoding server 34 such as a MIME type, a URL, a last modified time indicator. Thus, Tso does not disclose the claimed identity information storage.

Furthermore, the remote transcoding server 34 only includes a cache memory 30 that is described in Tso as being used to cache objects that it manages and stores such objects (col. 4, lines 38-45). The server side cache memory 30 enables maintenance of multiple representations of a given cached object with descriptive information about each representation included in the server side cache memory. The memory 30 may also serve as a synchronization point for multithreaded accesses to cached objects (col. 4, line 62-col. 5, line 2). In use, the transcode service providers 24 can use the server side cache memory to store several different versions of an object to support clients with different communications and/or presentation capabilities. The transcode service provider uses a separate thread to read the incoming datastream, transcode it and place it within the entry of the server side cache memory. (col. 6, lines 9-44). Thus, there is no disclosure in Tso of an identity storage that stores identity information including content elements that are associated with a plurality of

referring clients and a user. Rather, as clearly disclosed in Tso, the cache memory is only used to temporarily hold objects that have been received from an incoming datastream for transcoding (i.e., manipulation of data).

In support of its rejection of these claims, it is alleged in the Office Action that Tso discloses that the characteristics and preferences of users, content providers and servers are all stored in identity storages which are accessed by the transcoding server to perform dynamic customizations on requested content. Applicants disagree with this interpretation of the cited section of Tso. As discussed above, Tso merely describes examples of the types of information which may be used to dictate which of the transcode service providers 24 are invoked. Each of the examples provided such as network client preferences, user identity, proxy characteristics, etc., which are referred to in the Office Action, are merely used as selection criteria for software selection. Additionally, there is no disclosure of the determinants being stored in identity storages, but rather are merely being read from an incoming data packet received by the transcoding server (col. 6, line 64-col. 7, line 3).

Furthermore, as discussed above, the remote transcoding server 34 is only disclosed as having a cache memory 30. A cache memory merely stores the contents of frequently accessed RAM locations and the addresses where these data items are stored. When the processor references an address in memory, the cache checks to see whether it holds that address. If it does hold the address, the data is returned to the processor and if it does not, a regular memory access occurs. Thus, the cache memory 30 of Tso does not correspond to an identity storage as recited in the claims and described in the specification.

The Office Action also alleges that Tso teaches a skeleton/virtual content determining circuit as recited in the claims. In support of the allegation, the Office Action relies on col. 2, lines 44-55 which merely provides a definition of the term "transcode" as manipulation of

data including but not limited to adding, modifying or deleting data. Therefore, this section does not anticipate the claimed feature.

The Office Action also relies on col. 6, line 64-col. 8, line 9 as disclosing the skeleton/virtual content determining circuit. However, as discussed above, the cited section of Tso merely discloses selective invocation of one transcode service provider 24 based upon satisfaction of a predetermined selection criterion. The selection criterion may be information contained in a header portion of a data packet received by transcoding server 34 such as a MIME type, a URL, a last modified time indicator and so on. The number of examples of types of information which may be used to dictate the selection of a particular transcode service provider fails to disclose or suggest a skeleton/virtual content determining circuit as recited in the claims. Rather, the cited sections merely disclose examples of types of information which may be used to dictate the selection or invocation of a particular transcode service provider 24. The transcode service providers are defined as having the capability of compressing and/or scaling types of data content such as image, video or HTML, as well as a wide variety of transcoding functions (col. 3, lines 45-65). Thus, there is no disclosure or suggestion in Tso of a skeleton/virtual content determining circuit as recited in the rejected claims.

Furthermore, as discussed above regarding the rejection of claim 22, Tso merely discloses passing the same data object back and forth between the server and the client. Thus, Tso does not disclose or suggest creating a new (second) object, different from the first object and outputting the new object to the sending client and the user to maintain the look and feel of a client website.

Finally, it is admitted in the Office Action that Tso fails to disclose the additional feature of an identity storage that stores identity information <u>including style sheet</u>

information. To overcome the admitted deficiency, the Office Action relies on Hind, at col. 4, lines 48-56, and col. 9, lines 4-48. Hind relates to a method system and computer readable code for retrieving style sheets from a directory or other repository based on partial characteristic matching (col. 1, lines 16-20). An object of Hind is to provide a technique for using style sheet characteristics to select and retrieve an appropriate style sheet for a target environment using a pattern matching process and represent user preferences and/or device and browser capabilities. However, Hind fails to disclose an identity storage that stores style sheet information associated with a plurality of referring clients and a user. Rather, Hind merely discloses matching criteria based as user preferences, device type and browser type (col. 11, lines 39-44). Thus, Hind fails to disclose the additional feature as alleged in the Office Action.

Even if Hind disclosed the feature as alleged in the Office Action, Hind fails to disclose the additional feature of determining which of the stored identity information and the style sheet information correspond to the client and the user . . . based on received information, i.e., the identity of the client and user. Rather, Hind looks to the style sheet to determine a choice of style sheet and not the identity of the user (see col. 11, lines 39-60). Accordingly, withdrawal of the rejection of claims 1-21 under 35 U.S.C. §103(a) is respectfully requested.

## IV. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-22 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

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